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Attorneys for: Material Witness MOISES RAMIREZ-VALDEZ

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ODILON CIRA-RAMIREZ,

Defendant.

Criminal Case No. 08 cr 2429-WQH
Mag. Docket No. 08 mj 2098

**APPLICATION FOR AN ORDER
SHORTENING TIME TO HEAR
MATERIAL WITNESS MOISES
RAMIREZ-VALDEZ'S MOTION FOR
VIDEO DEPOSITION AND RELEASE**

JUDGE: Hon. William McCurine, Jr.
CRTRM: C, First Floor

DATE: August 14, 2008
TIME: 9:30 a.m.

MOISES RAMIREZ-VALDEZ ("RAMIREZ") hereby applies for an Order Shortening Time in which to hear his Motion for Video Deposition and Release. The Memorandum of Points and Authorities in support of the Motion, filed herewith, demonstrates the hearing of the Motion on shortened time is necessary; specifically, that RAMIREZ has been incarcerated since July 8, 2008 and has no hope of obtaining a surety to post his bond.

Dated: August 11, 2008

Mayfield & Associates

By: /s/ Gayle Mayfield-Venieris
Gayle Mayfield-Venieris, Esq.
Attorney for Material Witness
MOISES RAMIREZ-VALDEZ

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PROOF OF SERVICE VIA E-FILE
[Fed. R. Civ. Pro. 4, Local Rule 5]

I, Melissa L. Bustarde, declare as follows:

1. I am over eighteen years of age and not a party to the above-referenced action; my business address is 462 Stevens Avenue, Suite 303, Solana Beach, CA 92075-2066. I am employed in San Diego County, California.

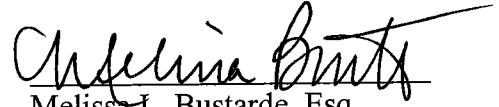
2. On August 11, 2008, I filed the aforementioned document on the Court's CM/ECF system in Case No. 08 mj 2098/08 cr 2429-WQH. The following counsel were electronically served with the aforementioned document via the CM/ECF system pursuant to Local Rule 5.4(c):

- **Motion to Shorten Time**
- **Notice of Motion and Motion to take deposition by Video**
- **Points and Authorities in Support of Motion for Video Deposition**

Peter Mazza, A.U.S.A
Efile.dkt.gc2@usdoj.gov

Andrew Lah, Esq.
Andrew_lah@fd.org

I declare under penalty of perjury under the laws of the United States, State of California
that the foregoing is true and correct and that this declaration was executed on August 11, 2008.


Melissa L. Bustarde, Esq.
Mayfield & Associates

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